



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

July 22, 2021

VIA ECF

Hon. Ronnie Abrams
United States District Judge
United States District Court
40 Foley Square
New York, New York 10007

Application granted. The initial pretrial conference is hereby adjourned until September 24, 2021 at 12:30 p.m.

SO ORDERED.

Hon. Ronnie Abrams
July 23, 2021

Re: *Yang v. Garland, et al.*, No. 21 Civ. 3480 (RA)

Dear Judge Abrams:

This Office represents the government in this action in which the plaintiff seeks an order compelling U.S. Citizenship and Immigration Services (“USCIS”) to adjudicate her Application to Register Permanent Residence or to Adjust Status (Form I-485). On behalf of the government, I write respectfully to request an on-consent extension of time of forty-five days to respond to the complaint (*i.e.*, from July 26 to September 9, 2021). I also respectfully request that the initial conference presently scheduled for August 13, 2021, be adjourned to the week of September 20, 2021 or thereafter.

The extension is respectfully requested in connection with USCIS’s Request for Evidence relating to the Form I-485. Although the response to the RFE is not due until August 16, 2021, the government understands that the plaintiff intends to respond by July 30. USCIS may be able to proceed to take adjudicative action within the requested extended period, which potentially would render this action moot. This is the government’s second request for an extension of the deadline to respond to the complaint and to adjourn the initial conference.¹ Plaintiff’s counsel consents to these requests.

I thank the Court for its consideration of this letter.

Respectfully submitted,

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United States Attorney

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cc: Counsel of record (via ECF)

¹ On May 21, 2021, the government requested an extension of its time to respond to the complaint and an adjournment of the initial conference in light of USCIS’s issuance of the RFE. *See* ECF No. 7. The Court granted the requests. *See* ECF No. 8.